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CENTRAL FAX CENTER

## REMARKS

JUL 14 2006

Reconsideration and allowance are respectfully requested.

Claims 1, 4-10 and 21-24 are pending in the application.

No claim amendments have been made herein.

## Claim Rejection - 35 U.S.C. 103

Claims 1 and 4 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Huffman '724 in view of Applicant's admitted Prior Art (AAPA).

Applicant respectfully traverses this rejection.

Claim 1, as previously presented, is directed to a unit for preparing leaves of paper from a continuous strip at a predetermined feed path which includes a cutting mechanism, by which the leaves are separated in succession from the strip at a predetermined cutting frequency, comprising a first aspirating conveyor and a second conveyor substantially tangential to the first conveyor; the first aspirating conveyor comprising a first suction roller and an outer surface of the first suction roller being at least a portion of an outer surface of the first conveyor. The unit also includes means for varying a tension of the strip cyclically and synchronously with the action of the cutting mechanism, capable of cyclical movement generated synchronously with the cutting frequency; the tension varying means comprising at least one diverter element revolving about a fixed axis parallel to an axis of the first conveyor between a first limit position radially below the surface of the suction roller and a second limit position radially beyond the surface of the suction roller.

Huffman discloses a method and apparatus for producing card sets wherein a unit for

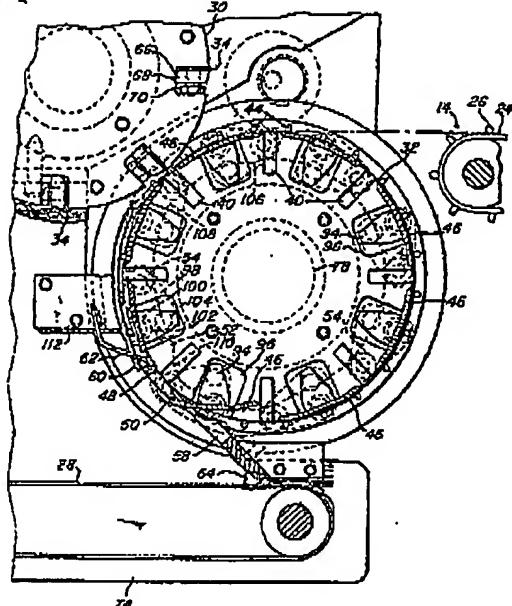
preparing leaves (P – packets) of paper from a continuous strip (14 - web) at a predetermined feed path which includes a cutting mechanism (cutter cylinder 30 and knives 34), by which the leaves P are separated in succession from the strip 14 at a predetermined cutting frequency. The Examiner associates Huffman's anvil cylinder 32 with the first conveyor of claim 1 and the cutter cylinder 30 with the second conveyor of claim 1. As acknowledged by the Examiner, Huffman fails to disclose that the first conveyor be an aspirating conveyor comprising a first suction roller. Huffman provides the first conveyor with pins 44 for engaging perforations 22 made in the strip 14. The pins preclude any shifting of the strip relative to the outer surface of the roller.

Huffman also fails to provide means for varying a tension of the strip 14 cyclically and synchronously with the action of the cutting mechanism 34, capable of cyclical movement generated synchronously with the cutting frequency. Indeed, Huffman does not teach or suggest any tension varying means or diverter element able to directly act on the strip 14, as required in claim 1.

In order to better distinguish the differences between the application and the cited references, Applicant respectfully notes that the Merriam-Webster Online Dictionary, defines a strip as "a long narrow piece of a material". This differs from leaves *cut from* a strip. That is, if one starts with a strip A of paper, and cuts leaves from that strip A, the leaves are no longer a part of strip A. In accordance with this definition, Huffman's strip 14 is the web of material disposed between the last acting cutter 34 of the cutter cylinder 30 (acting upon a respective anvil 40 of the anvil cylinder 32) and the pin band conveyor 24. The strip 14 does not include the leaves, packets or parcels P severed from strip 14 by the cutters 34. See col. 3, lines 29-

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To help illustrate this, Huffman's figure 1 has been proposed hereunder in an original version (Figure A) and a modified version (Figure B) in which the strip has been highlighted by a bold black line.

**FIG.A**

teaches use of a stripper 46 able to detach each leave P from the roller to fall on a discharge conveyor 28. Such strippers 46 are not comparable to the claimed tension means which requires varying a tension of the strip 14 because they 1) do not act on the strip 14 of Huffman and 2) act only to deflect the severed leaves P. Further, even though the strippers 46 are acting on the leaves P and not the web 14 as required by claim 1, since they act only after the cutters have penetrated the strip 14, it is believed that they still do not vary the tension of the web 14. See col. 4, lines 35-42. Again, claim 1 requires: "means for varying a tension of the strip cyclically and synchronously with the action of the cutting mechanism, capable of cyclical movement generated synchronously with the cutting frequency".

Application's Admitted Prior Art (hereafter AAPA) refers to a unit for preparing leaves of paper from a continuous strip at a predetermined feed path which includes a cutting mechanism by which the leaves are separated in succession from the strip at a predetermined cutting frequency. The unit comprises a first aspirating conveyor and a second conveyor substantially tangential to the first conveyor.

AAPA does not teach or suggest either 1) any means for varying a tension of the strip cyclically and synchronously with the action of the cutting mechanism, capable of cyclical movement generated synchronously with the cutting frequency; or 2) any diverter element.

Applicant respectfully points out that the Application is therefore allowable over the art of record because such art, even in combination with one another, does not teach or suggest all of the requirements of claim 1.

Neither Huffman nor AAPA teach or suggest the following requirements of claim 1:  
1) means for varying a tension of the strip cyclically and synchronously with the action of the

cutting mechanism, capable of cyclical movement generated synchronously with the cutting frequency; and 2) the tension varying means [which are acting on the strip] comprising at least one diverter element revolving about a fixed axis parallel to an axis of the first conveyor between a first limit position radially below the surface of the suction roller and a second limit position radially beyond the surface of the suction roller

Further, contrary to the Examiner's assertion, none of the Huffman strippers 46 revolves around a fixed axis parallel to an axis of the first conveyor, as required in claim 1 and noted above. To the extent that any stripper revolves about an axis, it is about a moving axis, which axis is rotating around the axis of the first conveyor. To the extent the Examiner interprets the fixed axis to be the axis of the first conveyor, this is also improper, since the fixed axis must be parallel to the axis of the first conveyor. If the fixed axis is interpreted to be the axis of the first conveyor, the requirement for parallelism between the two axes makes no sense. Therefore, the axis about which the diverter revolves must be 1) fixed, 2) parallel to the axis of the first conveyor and 3) different from the axis of the first conveyor. Huffman does not teach or suggest any such diverter, whether acting on the strip or anywhere else.

Indeed, even if Huffman and the AAPA were combined together to obtain a unit provided with a diverter like the one shown in Huffman, i.e. not acting on the strip but acting downstream of the cutter, it would not work like the claimed tension varying means and the strip would continue to irregularly break along the cut for the same reasons already explained as problems in the Background section of the present application.

Thus, a person of ordinary skill in the art would not combine such documents to obtain the claimed solution and could not obtain the claimed solution by only consulting the cited

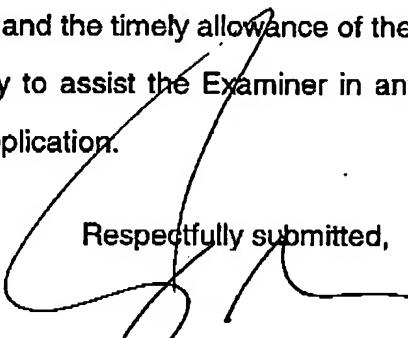
references. Rather, it would take a non-obvious step on the part of the skilled person to derive the claimed invention.

In view of the above, it is respectfully requested that the remaining rejections be withdrawn and the claims indicated as allowable.

### Conclusion

All matters having been addressed above and in view of the pending claims and remarks, applicant respectfully requests the entry of this amendment, the Examiner's reconsideration of the application, and the timely allowance of the pending claims. Applicants' counsel remains ready to assist the Examiner in any way to facilitate and expedite the prosecution of this application.

Respectfully submitted,



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